

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re

MADISON ASSET LLC,

Debtor in a Foreign Proceeding

MARTIN NICHOLAS JOHN TROTT and
CHRISTOPHER JAMES SMITH, on behalf of
and solely in their capacity as the Foreign
Representatives and Joint Official Liquidators of
MADISON ASSET LLC (IN LIQUIDATION),

Plaintiffs,

v.

DEUTSCHE BANK AG,

Defendant.

Chapter 15

Case No. 18-12814 (MEW)

Adv. Proc. No. 20-01237 (MEW)

**NOTICE OF DEFENDANT DEUTSCHE BANK AG'S
MOTION TO WITHDRAW THE REFERENCE**

PLEASE TAKE NOTICE that Defendant Deutsche Bank AG, by and through its undersigned attorneys, hereby moves for an order, pursuant to 28 U.S.C. § 157(d), Federal Rule of Bankruptcy Procedure 5011, and Local Bankruptcy Rule 5011-1, withdrawing the reference of the above-captioned Adversary Proceeding to the United States Bankruptcy Court for the Southern District of New York upon and for the reasons set forth in the accompanying Memorandum of Law in Support of the Motion to Withdraw the Reference, as well as the Declaration of Rupert Geoffrey Dangar Bell, dated December 4, 2020 and the exhibits attached thereto.

Dated: December 4, 2020
New York, New York

CAHILL GORDON & REINDEL LLP

By: /s/ David G. Januszewski

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 4th day of December 2020, copies of the Notice of Motion to Withdraw the Reference, the Memorandum of Law in Support of the Motion to Withdraw the Reference, and the Declaration of Rupert Geoffrey Dangar Bell, dated December 4, 2020 and the exhibits attached thereto were filed electronically in accordance with the local rules and were therefore served electronically using the Court's CM/ECF system, which will automatically send an email notification to counsel of record as follows:

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